

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
(Eastern Division)

|                                  |   |                         |
|----------------------------------|---|-------------------------|
| CHARLES C. JOHNSON and           | : |                         |
| GOT NEWS, LLC                    | : | Case No. 14:15-cv-01137 |
| Plaintiffs,                      | : |                         |
| v.                               | : |                         |
|                                  | : |                         |
| GAWKER MEDIA, LLC, J.K. TROTTER, | : |                         |
| and GREG HOWARD                  | : |                         |
|                                  | : |                         |
| Defendants.                      | : |                         |
|                                  | : |                         |

**CONSENT MOTION FOR EXTENSION OF TIME**  
**IN WHICH TO RESPOND TO PETITION**

Defendants Gawker Media, LLC, J.K. Trotter, and Greg Howard (together, “Defendants”), by and through their undersigned counsel, with consent of counsel for plaintiffs, move for an extension of time in which to respond to plaintiffs’ petition herein. In support of this motion, Defendants state:

1. This action for defamation, injurious falsehood and false light invasion of privacy, brought in five separate counts, was filed in Missouri state court on June 19, 2015 and timely removed to this Court on July 23, 2015.

2. Counsel for defendants require time to investigate the facts and law surrounding plaintiffs’ claims, but because defendants are located in New York and because of vacation plans of defense counsel, defense counsel will not reasonably be able to perform such investigation within the time prescribed by Federal Rule of Civil Procedure 81(c)(2)(C). For that reason, defendants request additional time through and including Friday, September 4, 2015 in which to file their responsive pleading.

3. Counsel has conferred with counsel for plaintiffs regarding this request, and counsel for plaintiffs consents to this extension of time.

4. Granting this request for extension will not unduly delay or hinder these proceedings, is made in the interest of justice, and not for the purpose of vexation, harassment or delay.

5. In filing this Motion, Defendants do not waive and do not intend to waive any defense available to them in law or in equity, including but not limited to defenses based on lack of personal jurisdiction or failure to state a claim upon which relief may be granted

6. A proposed Order is attached hereto.

WHEREFORE, Defendants request an extension through and including Friday, September 4, 2015 in which to file responsive pleadings to the petition herein.

Respectfully submitted,

**LEWIS RICE LLC**

By: /s/ Joseph E. Martineau

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*Attorneys for Defendants*

**CERTIFICATE OF SERVICE**

The undersigned certifies that on this 23<sup>rd</sup> day of July, 2015, a copy of the above and foregoing document was served via the Court's electronic filing system and U.S. mail on:

Jonathon Christian Burns  
**THE BURNS LAW FIRM**  
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*Attorneys for Plaintiff*

By: /s/ Joseph E. Martineau

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FOR THE EASTERN DISTRICT OF MISSOURI  
(Eastern Division)

CHARLES C. JOHNSON and  
GOT NEWS, LLC

Plaintiffs,

v.

GAWKER MEDIA, LLC, J.K. TROTTER,  
and GREG HOWARD

Defendants.

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Case No. 14:15-cv-01137

**ORDER GRANTING EXTENSION OF TIME**  
**IN WHICH TO RESPOND TO PETITION**

Upon motion of defendants and for good cause shown, and with consent of counsel for plaintiffs, defendants are granted through and including Friday, September 4, 2015 in which to respond to plaintiffs' Petition herein.

Date: \_\_\_\_\_

SO ORDERED:

\_\_\_\_\_  
United States District Judge